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**VIA ECF**

The Honorable Alvin K. Hellerstein  
Senior United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *United States v. Shangzhen Wu*  
23 Cr. 90 (AKH)

June 12, 2023

Dated, without prejudice  
subject to submissions to  
PTS and AUSA for  
consents.  
6-13-23

*John K. Hellerstein*

Dear Judge Hellerstein:

Please recall that I represent Mr. Shangzhen Wu in his defense of the above-referenced matter. Mr. Wu met his bond conditions and was released from custody on Friday, June 9, 2023. For the reasons that follow, I write to respectfully request that Your Honor grant a temporary modification of Mr. Wu's bond conditions to permit him to leave his home while on home incarceration and attend to important errands at a local T-Mobile cell phone store and a local Chase Bank.

On March 2, 2023, Mr. Wu was arraigned before United States Magistrate Judge Gabriel W. Gorenstein. Judge Gorenstein set conditions of release on a \$50,000.00 personal recognizance bond to be co-signed by two financially responsible persons and secured by \$5,000.00 cash. Judge Gorenstein also set the following conditions of release: supervision by United States Pretrial Services ("Pretrial") as directed; surrender all travel documents and no new applications for travel documents; travel restricted to the Southern and Eastern Districts of New York and the District of New Jersey; home incarceration; location monitoring as directed by Pretrial; and no contact with witnesses or alleged victims. Judge Gorenstein further ordered that Mr. Wu cannot possess the identifying information of others or open any new bank accounts, and if Mr. Wu is released, he is to reside at his residence in Jersey City, New Jersey.

If granted permission, Mr. Wu would travel to a local T-Mobile store to re-activate his cell phone service on a new device. Since his release from custody on June 9, 2023, Mr. Wu has been temporarily borrowing a friend's cell phone, but he requires his own cell phone with an active phone number in order to comply with the conditions of his release, including location monitoring and reporting to Pretrial as directed. Additionally, Mr. Wu would travel to a local

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The Honorable Alvin K. Hellerstein

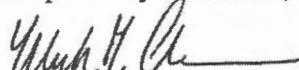
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Chase Bank to obtain a new debit card for a pre-existing bank account so that he can pay his living expenses while on release. Mr. Wu would then promptly return to his residence.

Thank you for your consideration of this request.

Respectfully submitted,



Mark I. Cohen

MIC/gmf

Cc: A.U.S.A. Jerry Fang (via ECF)  
Mr. Shangzhen Wu